
**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

THE PENNSYLVANIA STATE UNIVERSITY; Plaintiff, vs. KEYSTONE ALTERNATIVES LLC d/b/a GOPSURV.COM and MARK LAUER; Defendants.	Case No. 1:19-CV-2039 Hon. Yvette Kane
------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------

DEFENDANTS' EXPERT WITNESS DISCLOSURES

Defendants Keystone Alternatives LLC and Mark Lauer, by and through counsel, hereby make their expert witness disclosures. At the present time, Defendants reasonably expect to offer the expert testimony of: (1) Jeffrey J. Neuman, a domain name expert, attorney and former UDRP judge; and (2) Steven Boyles, a CPA and an expert in damages.

It is anticipated that Mr. Neuman will provide testimony relevant to the distinctiveness and descriptiveness of <gopsurv.com> and issues relating to domain selection and registration of gTLDs.

It is anticipated that Mr. Boyles will provide testimony relevant to damages, revenue, profits and other financial and accounting considerations.

Mr. Neuman's curriculum vitae and expert report are attached hereto as **Exhibit A**.

Mr. Boyles curriculum vitae and expert report are attached hereto as **Exhibit B**.

DATED this the 30th day of September 2021.

/s/ Steven Rinehart

Steven Rinehart (Pro Hac Vice)

VESTED LAW, LLP

110 S. Regent Street, Suite 200

Salt Lake City, UT 84111

Telephone: (888) 941-9933

Mobile: (801) 347-5173

Facsimile: (801) 665-1292

Email: steve@websiteattorneys.com

Jeremy A. Donham (206980)

DONHAM LAW

315 High Street

Morgantown, WV 26505

Tel: 717-881-7855

Email: j.donham@donhamlaw.com

Charles J. Hobbs (209321)

THE HOBBS LAW FIRM

256 E. Market Street

York, PA 17403

Tel: 717-793-2398

Email: chobbs@thehobbslawfirm.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of September 2021, a true and correct copy of the foregoing **DEFENDANT'S EXPERT WITNESS DISCLOSURES** was served on the following person(s) indicated below:

All parties/counsel of record, including: Megan Haines Lucy Jewett Wheatley Claire Hagan Eller Matthew Rosendahl MCGUIRE WOODS LLP 260 Forbes Avenue Pittsburgh, PA 15222 Phone: (412) 667-6000 <i>Attorneys for Plaintiff</i>	<input type="checkbox"/> US Mail, Postage Prepaid <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivery <input type="checkbox"/> Federal Express <input checked="" type="checkbox"/> Electronically (ECF/PACER)
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

/s/ Steven Rinehart
Steven Rinehart (Pro Hac Vice)
VESTED LAW, LLP
110 S. Regent Street, Suite 200
Salt Lake City, UT 84111
Telephone: (888) 941-9933
Mobile: (801) 347-5173
Facsimile: (801) 665-1292
Email: steve@utahpatentattorneys.com